



September 15, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, Roadstar Internet, provides fixed wireless broadband service primarily in Loudoun County, VA. We rely on unlicensed spectrum to deliver broadband services to consumers that have no or few broadband choices. We built our network from the ground up including the use of devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in rural Loudoun County get broadband service from our network of wireless transmitters located throughout the area.

Roadstar Internet is very interested in utilizing television white spaces so that we can provide service to the customers in our markets that cannot get a signal today- these customers are often "in the woods" or behind other obstructions like nearby homes that prevent line of site required with the available unlicensed frequencies we already use. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available in order to correct this divide of those that are "in the trees vs. open space" and expect this to be the case throughout rural and underserved areas, especially in markets served by existing WISPA members who have already established backhaul and tower infrastructure waiting for these new frequencies. Getting beyond the "tree divide" is also the key to seeing wireless broadband deployed in markets that have been untouched because of the lack of enough "line of site" opportunities to build a business case.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for licensed point-to-point wireless backhaul. We do not support using white space spectrum for any licensed point to point backhaul- all of this spectrum is needed for delivery of service to end users and would not provide enough capacity for backhaul links anyhow. We ask the FCC to reject the FiberTower proposal.

Regards,

Martin Dougherty
CEO
Roadstar Internet Inc.